

REMARKS

Reconsideration and further examination of the subject patent application in view of the RCE submitted herewith and in view of the present Amendment and the following Remarks is respectfully requested. Claims 1-27 are currently pending in the application. Claim 1-5, 10-14, and 19-23 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 7,233,980 to Holden et al. ("Holden") in view of Foti (U.S. Pat. Pub. No. 2002/0194378) and further in view of U.S. Pat. No. 6,570,980 to Baruch. Claims 8, 17, and 26 have been rejected under 35 U.S.C. §103(a) as unpatentable over Holden in view of Foti and Baruch, and further in view of U.S. Pat. Pub. No. 2004/0120502 to Strathmeyer et al. ("Strathmeyer") and claims 9, 18, and 27 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Holden in view of Foti and Baruch, and further in view of U.S. Pat. No. 6,816,912 to Borella et al. ("Borella"). Claims 6, 7, 15, 16, 24 and 25 have been rejected under 35 U.S.C. §103(a) as being patentable over Holden, Foti, Baruch, and Wengrovitz (U.S. Pat. Pub. No. 2002/0141404). Claims 1, 9, 10 and 19 have been amended for clarification. After a careful review of the claims and cited references, it is believed that the claims are in allowable form and therefore a Notice of Allowance is respectfully requested.

Holden describes a system and method for queuing using SIP messaging usable for ACD services using SIP signaling and for allowing a SIP subscriber to interact with an ACD system in the PSTN work space. This is entirely different from the claimed system and method of routing a SIP call within an automatic call distribution system where the SIP call is forwarded from a first server to the ACD and then routed through a second server while concealing the address of the assigned agent from the caller to maintain anonymity of the agent. Foti describes a system for

hiding the source address of an originating home network IP address by mapping the source address to an IP address of a Media Source Function within the home network and forwarding it to the destination home network.

All the independent claims 1, 10, and 19 concern a method/apparatus which sets up a SIP call directed to an ACD by a first server, between one of a plurality of agents selected to handle the call by the ACD and the caller, through a separate buffer server which maintains anonymity of the agent by concealing the URL's and any other identification information of the agent SIP messages. In Claim 1, as amended, including the first server modifying the SIP message by changing the address of the first server in the SIP message to an address of the selected agent and a domain name of the first server to a domain name of the separate buffer server (see, e.g. paragraph 0035) and in Claim 12, including the first server sending the initial SIP message to the buffer server with an identifier of the selected agent and the buffer server modifying the initial SIP message based on the identifier and forwarding the modified SIP message to the selected agent (see, e.g. paragraph 0041-42). Claim 19 has also been amended to claim the buffer server forming a URL pair in response to a SIP instant message from the first server to cause the buffer server to create a communications path between the buffer server and the caller (see, e.g. paragraphs 0036-38). Claims 9 has also been amended to clarify the SIP INVITE is encoded with the identifier of the selected agent (see, e.g. paragraph 0041).

Claims 1-5, 10-14, and 19-23 have been rejected as obvious over Holden and Foti. However, Holden concerns conventional calls directly to an ACD and use of SIP messaging to exchange data regarding status in the queue to allow the caller to decide whether to hang-up or not. As a result, Holden does not concern a call sent to an ACD thru the first server, and does not

disclose selecting one of a plurality of agents; setting up a SIP call between the selected agent and the caller after the ACD system receives the initial SIP message; or setting up the SIP call through a second server or a buffer server. The Office Action cites Holden at Col. 8, line 50 as disclosing a SIP server in the ACD. However, this server is described as included in the ACD, and thus cannot be the claimed first server which forwards the call to the ACD (i.e. the call must have already come to the ACD to get to the server in the ACD). Holden merely describes a direct connection set up between one caller to an agent. Holden also fails to disclose setting up a SIP call between the selected agent and the caller through a second server. The Office Action cites ref. 49 of Fig. 6 and Col. 9, lines 45-64 as disclosing this feature. However, Fig. 6, ref. 49 merely shows transfer of the call to a live agent, and Col. 9, lines 45-64 merely describe the caller transferred to a live agent. There is no description of setting up a SIP call, or routing any SIP messages through a second, different server. Nor does Holden teach a second server modifying the source address of the selected agent's SIP messages by substituting that of the second or buffer server to thereby maintain anonymity of the agent by concealing the URL and any other identifying information of the agent.

The Office Action concedes that Holden does not teach a second server modifying the source address of the SIP message from the agent, but asserts that Foti does in the abstract and paragraphs 0008, 0030, 0048, and 0049. However, Foti discloses a system of hiding the address of a single originating home terminal when a message is sent from the original terminal to a single destination terminal. The MRF described in Foti is not a second server, but is an entity located within a home network of a single home user (see paragraph 0028). Thus, Foti also does not concern the claimed ACD system in which the addresses of a plurality of agents are protected

when an agent is assigned. Accordingly, Foti, as in Holden, also does not disclose a call first directed to an ACD thru a first server; does not disclose selecting one of a plurality of agents; does not disclose setting up a call with a selected agent, and the caller, or setting up the call through a second server. Nor does Foti teach the first server modifying the SIP message by changing the address of the first server to an address of the selected agent and changing the domain name of the first server to a domain name of the separate second server; or modifying the message received by the second server or the second server readdressing and forwarding messages to the agent. For example, in paragraphs 0048-49, the originating message is sent directly from Terminal A to the MRF-M1016 of Terminal B and passed thru with the source address unchanged (see paragraph 0048, lines 6-15). There is no ACD, no first server forwarding a SIP message to an ACD, no plurality of agents, no second server and thus no modifying SIP message's first server address and first domain name, and no modifying or forwarding by a second server. In addition, Foti does not disclose the first server sending the initial SIP message to the buffer server along with an identifier of the agent and the buffer server modifying the initial SIP and forwarding the modified message to the selected agent (Claim 12), or the buffer forming a URL pair in response to a SIP instant message sent from the first server to the buffer to create a communications path to the caller. Baruch is cited for teaching selecting an agent but does not teach the above discussed undisclosed features which are also not disclosed by Wengrovitz, Strathmeyer or Borella. Thus, the cited references taken together do not teach all the limitations of the independent claims 1, 10, and 19, and therefore, these claims are distinguishable over the cited references. In addition, the dependent claims 2-9, 11-18, and 20-27 are also distinguishable over the cited references because they depend from allowable

independent claims 1, 10, and 19.

Claims 4-9, 13-18, and 22-27 are also further distinguishable because none of the cited references disclose the claimed modifications of the INVITE message, agent selection, or agent identifier as claimed. Wengrovitz's teaches direct end to end SIP calls, and does not teach sending a SIP INVITE to a buffer server, or entering the forwarded message into a routing table in the buffer server. The description in paragraph 0006 describes a location server which resolves the called URL to a more precise address but does not describe a buffer resident routing table into which the INVITE message is entered along with an agent identifier. Further, paragraph 0041 merely describes determining an address of a called end-point, and thus does not describe appending the agent identifier to a URL of the buffer with the SIP INVITE, and paragraph 0005 describes a generic URL, but does not describe forwarding a SIP INVITE from a proxy server to a buffer server along with an identifier of a selected agent. Thus, claim 6, 7, 15, 16, 24 and 25 are further distinguishable over the cited references. Further, Strathmeyer merely describes protocol conversion, but does not disclose encoding a forwarded SIP INVITE as an instant message. Thus, claim 8, 17 and 26 are further distinguishable over the cited references.


For the foregoing reasons, applicant submits that the subject application and all pending claims 1-27 are in condition for allowance, and applicant earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the

extension of time fee, petition fee, extra claims fee, RCE fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920.

Respectfully submitted,

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